IN THE

SUPREME COURT OF THE UNITED STATES

OCTOBER TERM, 1971

NO. 71-

THE TEXAS HIGHWAY DEPARTMENT, ET AL.,

Petitioners

vs.

NAMED INDIVIDUALS,

Respondents

MOTION FOR LEAVE TO FILE AMICUS CURIAE BRIEF ON BEHALF OF GREATER SAN ANTONIO CHAMBER OF COMMERCE

HUBERT W. GREEN,
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Attorney for Amicus Curiae
Greater San Antonio
Chamber of Commerce

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GREATER SAN ANTONIO CHAMBER OF COMMERCE, being unable to obtain consent of Respondents herein pursuant to Rule 42, moves the court for leave to file a brief as Amicus Curiae, in support of the Petition for Writ of Certiorari, showing cause as follows:

1. Movant is a membership association of business, professional and civic minded individuals interested in the growth and welfare of the City of San Antonio. As such, it has a vital interest in the North Expressway project which is the subject matter of this litigation, having actively participated in the planning and development of San Antonio's urban highway system.

2. Movant avers that none of the parties will adequately present the facts of the controversy from the

standpoint of the potential users and consumers who suffer extreme and personal loss from the delay in completion of the Expressway, and who possesses independent views on the issue of damage to the federal-state relationship, which is presented by this appeal.

3. The extremity of the user-consumer's plight, and the potential effect on future federal-aid projects, to include the viewpoint of this association in these respects, are believed to be vital and necessary to the court's understanding of the present problem, and therefore relevant and useful to the disposition of the case.

WHEREFORE, Movant prays leave to file a brief as Amicus Curiae.

Respectfully submitted,

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